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Attorneys for Defendant
Mr. Vasquez

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-CR-175-KJM
Plaintiff,)	
vs.)	STIPULATION AND ORDER TO CONTINUE
)	STATUS HEARING AND EXCLUDE TIME
VINCENT JOSE VASQUEZ,)	Date:
Defendant.)	Time:
)	Judge: Kimberley J. Mueller

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney David Spencer, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmoammadi, counsel for Defendant Vincent Jose Vasquez, that the previously scheduled Status Hearing set for November 18, 2021 be continued to January 10, 2022 at 9:00 a.m.

The parties specifically stipulate as follows:

- On September 20, 2021, an Information was filed in the instant matter and the case was set for a Status Hearing before the Honorable Morrison C. England, Jr. on November 18, 2021 at 10:00 a.m.
- Time was ordered excluded from September 21, 2021 (the date of the arraignment) to November 18, 2021. ECF no. 20.
- On November 9, 2021, per ECF no. 22, the case was reassigned to the Honorable

1 Kimberley J. Mueller and the November 18, 2021 status hearing was vacated with
2 instructions to reschedule any previous hearings with the newly assigned district
3 judge.

4 4. Mr. Vasquez moves for the Status Hearing to be continued to January 10, 2022 at
5 9:00 a.m.

6 5. The government has produced 72 pages of discovery to Mr. Vasquez, and the
7 parties have been in active plea negotiations.

8 6. Mr. Vasquez requires additional time to review the discovery; investigate and
9 research possible defenses; research potential pretrial motions; explore potential
10 resolutions to the case; and otherwise prepare for trial.

11 7. Mr. Vasquez believes that failure to grant his motion would deny him the
12 reasonable time necessary for effective preparation, taking into account the
13 exercise of due diligence.

14 8. The government does not object to Mr. Vasquez's motion.

15 9. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
16 Act), the parties request that the time period between November 18, 2021 and
17 January 10, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. §
18 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
19 granted by the Court at the defense's request, based on a finding that the ends of
20 justice served by granting the continuance outweighs the best interest of the
21 public and Mr. Vasquez in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: November 10, 2021

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Vasquez

Date: November 10, 2021

PHILLIP A. TALBERT
Acting United States Attorney

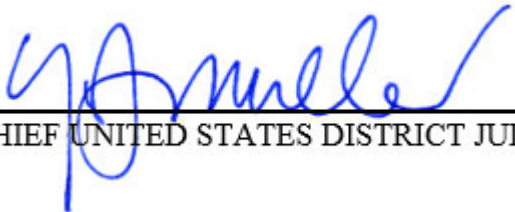
/s/ David Spencer
DAVID SPENCER
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Status Hearing set for November 18, 2021 is continued to January 10, 2022 at 9:00 a.m. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the time period between November 18, 2021 and January 10, 2022, inclusive, is excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4).

IT IS SO ORDERED.

DATED: November 17, 2021.


CHIEF UNITED STATES DISTRICT JUDGE